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Ref. No.: 2000.034

## REMARKS

### I. INTRODUCTION

Claims 1 and 38 have been amended. Claims 1, 4-20 and 22-38 remain pending in the present application. In view of the above amendments and the following remarks, it is respectfully submitted that all of the pending claims are allowable.

### II. CLAIM REJECTIONS – 35 U.S.C. § 101

Claims 1 and 38 stand rejected under 35 U.S.C. § 101 as directed to non-statutory subject matter. (See 10/15/07 Office Action, pp. 2-3.) Specifically, the Examiner asserts that the translator of claims 1 and 38 is merely functional descriptive material. (See *id.*, p. 2.) In view of the above Amendments, it is respectfully submitted that these rejections should be withdrawn.

### III. CLAIM REJECTIONS – 35 U.S.C. § 103(a)

In paragraphs 6 and 7 of the 10/15/07 Office Action, the Examiner states that claims 1, 4-20 and 22-38 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Pub. No. 2002/0052893 to Grobler et al. (hereinafter “Grobler”) in view of U.S. Patent No. 4,910,704 to Gemma (hereinafter “Gemma”). (See *id.*, p. 3.) However, in paragraph 10 of the Office Action, the Examiner concedes that Gemma is not properly combined with Grobler, in response to the Applicant’s previously filed arguments, and withdraws Gemma from the rejections. (See *id.*, pp. 9-10.) In view of this withdrawal, the Applicant has assumed that paragraphs 6 and 7 were unintentionally included in the 10/15/07 Office Action as an artifact of the rejection presented in the 5/1/07 Office Action, and will proceed accordingly.

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#### IV. CLAIM REJECTIONS – 35 U.S.C. § 102(e)

Claims 1, 4-20 and 22-38 stand rejected under 35 U.S.C. § 102(e) as anticipated by Grobler. (See *id.*, pp. 3-9.)

Claim 20 recites “[a] method of translating a file from a source format to a target format, the method comprising: (a) identifying a feature set of a source file; (b) assembling the feature set in a buffer; and (c) writing the feature set into a target file in the target format.”

Grobler describes a computer-based method and system for importing a table data from a selected source document into a selected target document. (See Grobler, Abstract.) Specifically, a user of the system may select a source and a target during the import process. (See *id.*, ¶¶ [0060] – [0061].) The selections may be made using either a drag-and-drop function or by a copy-and-paste function of a clipboard provided by the system. (See *id.*, ¶¶ [0019], [0062].) Upon selecting the source and target of the import process, the selected source data is temporarily stored within the system. (See *id.*, ¶ [0063].) The table structure of the temporarily stored source data is analyzed by parsing the source data for tags in order to identify columns and rows contained in the source data, in addition to the contents of the columns and rows of the source data. (See *id.*, ¶ [0064].) After the table structure of the source data is analyzed, the system determines whether the user has selected to specify the format of the target table, wherein the user may choose and modify the data contained in the source data. (See *id.*, ¶¶ [0068] – [0069].) After processing the user settings, the system creates an empty target table having a table structure in accordance with the results of the user settings. (See *id.*, ¶ [0070].) Finally, the empty table target is filled with the source data by inserting the contents of the columns and rows of the source data into the empty target table. (See *id.*, ¶ [0072].)

The Examiner asserts that Grobler discloses “assembling the feature set in a buffer ([0067]-[0069], [0071]: analyzing the tags in the source table data and selecting only tags suitable for creating a target table to import the target file show assembling the feature set in a buffer where data is temporarily stored)...” (10/15/07 Office Action, p. 4.) The Applicant respectfully submits that the Examiner misreads Grobler. Grobler does discuss temporarily

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storing source data, which implies the use of temporary storage such as a buffer for the source data. (See Grobler, ¶¶ [0063]-[0064].) However, Grobler contains no corresponding disclosure stating that the target table is stored in a buffer, temporarily stored, located in temporary storage, etc. (See id., ¶¶ [0068]-[0072].) Therefore, the Applicant respectfully submits that Grobler does not disclose “assembling the feature set in a buffer,” as recited in claim 20. Accordingly, this rejection should be withdrawn. Because claims 22-33 depend from, and, therefore, include all of the limitations of claim 20, it is respectfully submitted that these claims are also allowable for at least the reasons stated above.

Claim 34 recites “[a] method of configuring a system to translate a source file in a source format to a target file in a target format, the method comprising: (a) providing a feature identifier to determine a feature set of the source file; (b) providing a buffer to assemble the feature set; and (c) providing a feature writer to write the feature set into the target file in the target format.”

The Applicant respectfully submits that Grobler does not disclose “providing a buffer to assemble the feature set,” as recited in claim 34, for the reasons discussed above with reference to claim 20. Accordingly, this rejection should be withdrawn.

Claim 35 recites “[a] system for translating a source file in a source format to a target file in a target format, the system comprising: a feature identifier to determine a feature set of the source file; a buffer to assemble the feature set; a feature writer to write the feature set into the target file in the target format; and an output module to output the target file.”

The Applicant respectfully submits that Grobler does not disclose “a buffer to assemble the feature set,” as recited in claim 35, for the reasons discussed above with reference to claim 20. Accordingly, this rejection should be withdrawn.

Claim 36 recites “[a]n article of manufacture for translating a source file in a source format to a target file in a target format, the article of manufacture comprising: a computer usable medium having a computer readable program code embodied therein, the computer usable

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medium having: computer readable program code for identifying a feature set of the source file; computer readable program code for assembling the feature set in a buffer; and computer readable program code for writing the feature set into the target file in the target format.”

The Applicant respectfully submits that Grobler does not disclose “computer readable program code for assembling the feature set in a buffer,” as recited in claim 36, for the reasons discussed above with reference to claim 20. Accordingly, this rejection should be withdrawn.

Claim 37 recites “[c]omputer readable program code for translating a source file in a source format to a target file in a target format, the computer readable program code comprising: computer readable program code for identifying a feature set of the source file; computer readable program code for assembling the feature set in a buffer; and computer readable program code for writing the feature set into the target file in the target format.”

The Applicant respectfully submits that Grobler does not disclose “computer readable program code for assembling the feature set in a buffer,” as recited in claim 37, for the reasons discussed above with reference to claim 20. Accordingly, this rejection should be withdrawn.

Claim 1, as amended, recites “[a] translator, embodied in a computer readable storage medium, for translating a source file in a source format to a target file in a target format, the translator comprising: a feature identifier to determine a feature set of the source file; a buffer to assemble the feature set; a feature writer to write the feature set into the target file in the target format; and an output module to output the target file.”

The Applicant respectfully submits that Grobler does not disclose “a buffer to assemble the feature set,” as recited in claim 1, for the reasons discussed above with reference to claim 20. Accordingly, this rejection should be withdrawn. Because claims 4-19 depend from, and, therefore, include all of the limitations of claim 1, it is respectfully submitted that these claims are also allowable for at least the reasons stated above.

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Claim 38, as amended, recites “[a] translator, embodied in a computer readable storage medium, for translating a source file in an MIF format to a target file in an HTML format, the translator comprising: a feature identifier having a front-end lookup table to map MIF code fragments of the source file to a list of features to determine a feature set of the source file; a buffer to store and assemble the feature set; a feature writer having a back-end lookup table to map the feature set to HTML code fragments, to write the feature set into the target file in the HTML format; and an output module to output the target file.”

The Applicant respectfully submits that Grobler does not disclose “a buffer to store and assemble the feature set,” as recited in claim 38, for the reasons discussed above with reference to claim 20. Accordingly, this rejection should be withdrawn.


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**CONCLUSION**

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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